



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/1/2012

Chip Klosterman
Klosterman Hearth Grain Bakery LLC
4760 Paddock Road
Cincinnati, OH 45229

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1483140455
Permit Number: P0110403
Permit Type: OAC Chapter 3745-31 Modification
County: Warren

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Western Star. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
SWOQA; Indiana; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Klosterman Hearth Grain Bakery LLC (permittee) operates two (2) natural gas-fired commercial bakery ovens at their commercial bakery facility.

3. Facility Emissions and Attainment Status:

Emissions from the facility include volatile organic compounds (VOC) from the yeast-leavened baked products produced and the products of combustion from fuel burning in their natural gas ovens. The facility is located in Warren County which is designated nonattainment for ozone (i.e. VOC as a precursor of ozone) and attainment for the rest of the criteria pollutants.

4. Source Emissions:

Emissions of VOC from the two ovens prior to obtaining federally-enforceable restrictions are 139.83 tons per year (TPY) based on uncontrolled potential to emit (PTE) evaluation; thereby, without obtaining these federally-enforceable restrictions, the permittee would be considered a major stationary source subject to Title V operating permit requirements and Reasonable Achievable Control Technology (RACT) regulations through Ohio Administrative Code (OAC) rule 3745-21-12 for Commercial Bakery ovens. This federally enforceable permit to install and operate (FEPTIO) will contain federally-enforceable restrictions on production to limit emissions of VOC to 90.00 TPY.

5. Conclusion:

The production restrictions contained within this FEPTIO allow the facility to avoid being deemed a major stationary source subject to Title V operating permit requirements and the RACT regulation of OAC rule 3745-21-12 for Commercial Bakery ovens. This FEPTIO includes rolling, 12-month limitations and recordkeeping/reporting requirements sufficient to maintain the synthetic minor permitting status for VOC emissions for this facility.

6. Please provide additional notes or comments as necessary:

None.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	90.00
NOx	4.16
CO	1.93

PUBLIC NOTICE

10/1/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Klosterman Hearth Grain Bakery LLC

350 S. Pioneer Blvd.,
Springboro, OH 45066

Warren County

FACILITY DESC.: Commercial Bakeries

PERMIT #: P0110403

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 Modification for one (1) Pulver tunnel oven and one (1) Babbco tunnel oven at a yeast-leavened bakery operation for an increase in yeast percentage and to incorporate Synthetic Minor restrictions for VOC emissions to avoid Title V and RACT requirements.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Alberta Mellon, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Klosterman Hearth Grain Bakery LLC**

Facility ID:	1483140455
Permit Number:	P0110403
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/1/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Klosterman Hearth Grain Bakery LLC

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Authorization

Facility ID: 1483140455
Application Number(s): A0045063, A0045486, A0045500
Permit Number: P0110403
Permit Description: Chapter 31 Modification for one (1) Pulver tunnel oven and one (1) Babbco tunnel oven at a yeast-leavened bakery operation for an increase in yeast percentage and to incorporate Synthetic Minor restrictions for VOC emissions to avoid Title V and RACT requirements.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$2,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/1/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Klosterman Hearth Grain Bakery LLC
350 S. Pioneer Blvd.
Springboro, OH 45066

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0110403

Permit Description: Chapter 31 Modification for one (1) Pulver tunnel oven and one (1) Babbco tunnel oven at a yeast-leavened bakery operation for an increase in yeast percentage and to incorporate Synthetic Minor restrictions for VOC emissions to avoid Title V and RACT requirements.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P001
Company Equipment ID:	Pulver tunnel oven
Superseded Permit Number:	P0109374
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Babb Oven
Superseded Permit Number:	P0107423
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. P001, Pulver tunnel oven

Operations, Property and/or Equipment Description:

4524 lbs/hr (max.) baked products Pulver tunnel oven rated at 4.3 MMBtu/hr (max.), natural gas fired

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d., c)(1), d)(1), e)(2), f)(1)c. and d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(A)(3)(b), ORC 3704.03(T), and OAC rule 3745-31-05(D).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx emissions from this air contaminant source since the uncontrolled potential to emit for NOx is less than 10 tons/year.

c) Operational Restrictions

- (1) The maximum annual production rate for this emissions unit shall not exceed 10,205 tons of baked product, based upon a rolling, 12-month summation of the production rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the baked products production rate, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. for each baked product, the production rate, in tons;
 - b. for each baked product, the emission rate, in pounds of VOC per ton of baked product, using the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97:

$$\text{VOC EF} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

where: VOC EF = VOC Emission Factor in pounds VOC per ton of baked product

Y_i = initial baker's percent of yeast

t_i = total yeast action time in hours



S = final (spike) baker's percent of yeast

ts = spiking time in hours

- c. the rolling, 12-month summation of the baked products production rates as recorded in a., in tons, for the current month plus the preceding 11 calendar months;
- d. for each baked product, the VOC emissions calculated by multiplying the baked product production rate from a., in tons per month, by the emission rate calculated in b., in pounds of VOC per ton of baked product, and divided by 2000 pounds per ton, for an emission rate of tons of VOC per month;
- e. the total VOC emissions from this emissions unit, as the summation of the VOC emissions from the baked products as calculated in d., for an emission rate of tons of VOC per month; and
- f. the rolling, 12-month summation of the VOC emission rates as calculated in e., in tons, for the current month plus the preceding 11 calendar months.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 5.88 pounds of VOC per ton of baked product Applicable Emission Limitation;
 - ii. all exceedances of the rolling, 12-month VOC Applicable Emission Limitation; and
 - iii. all exceedances of the rolling, 12-month limitation of the production rate.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions of nitrogen oxides (NOx) shall not exceed 100 pounds per million cubic feet of natural gas.

Applicable Compliance Method:

If required, compliance with the NOx emission limitation shall be demonstrated by an emission test employing Method 7 of 40 CFR Part 60, Appendix A. If required, an alternative U.S. EPA approved test method may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established on the NOx emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98, of 100 pounds of NOx per million cubic feet of natural gas.

b. Emission Limitation and uncontrolled PTE:

Emissions of nitrogen oxides (NOx) shall not exceed 1.84 TPY.

Applicable Compliance Method:

If required, compliance with the annual NOx emission limitation shall be demonstrated by multiplying the actual annual usage of natural gas in the oven, in million cubic feet per year by the NOx emission factor of 100 pounds of NOx per million cubic feet of natural gas, and divided by 2000 pounds per ton, for an emission rate of TPY of NOx.

The applicable emission limitation and uncontrolled PTE NOx was established based on information provided by the permittee in application number A0045500 for FEPTIO number P0110403 and the NOx emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98:



4.3 Million Btu/hr, max heat input x million standard cubic feet (scf) of natural gas/1020 Million Btu = 0.004216 million scf of natural gas/hr, max heat input

0.004216 Million scf of natural gas/hr x 100 pounds of NOx/million scf of natural gas = 0.42 pound of NOx/hr

0.42 pound of NOx/hr x 8760 hrs/yr x 1 Ton/2000 pounds = 1.84 TPY of NOx.

c. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 5.88 pounds per ton of baked product.

Applicable Compliance Method:

Compliance with the pounds per ton of baked product VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 and the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97, for the white buns baked product:

VOC EF = 0.95Yi + 0.195ti - 0.51S - 0.86ts + 1.90

VOC EF = 0.95 (4.0) + 0.195 (0.9) - 0.51 (0) - 0.86 (0) + 1.90

VOC EF = 3.80 + 0.18 - 0 - 0 + 1.90

VOC EF = 5.88 pounds of VOC per ton of baked product

d. Emission Limitation:

Emissions of VOC shall not exceed 30.00 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual rolling, 12-month VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 using the VOC EF as calculated for the white buns baked product:

5.88 pounds of VOC/ton of baked product x 10,205 tons of baked product x 1 Ton/2000 pounds = 30.00 TPY of VOC.

g) Miscellaneous Requirements

(1) None.



2. P002, Babb Oven

Operations, Property and/or Equipment Description:

Babbco Model A52/48 direct fired 5.4 MMBtu bakery oven for yeast-leavened products at 5625 pounds per hour.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d., c)(1), d)(1), e)(2), f)(1)c. and d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(A)(3)(b), and ORC 3704.03(T).



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row d: OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V operating permitting and RACT requirements. Emissions of VOC shall not exceed 60.00 TPY based on a rolling, 12-month summation. See b)(1)c. and c)(1).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx and CO emissions from this air contaminant source since the uncontrolled potential to emit for NOx and CO is less than 10 TPY each.

c) Operational Restrictions

(1) The maximum annual production rate for this emissions unit shall not exceed 15,464 tons of baked product, based upon a rolling, 12-month summation of the production rates.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the baked products production rate, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. for each baked product, the production rate, in tons;

- b. for each baked product, the emission rate, in pounds of VOC per ton of baked product, using the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97:

$$\text{VOC EF} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

where: VOC EF = VOC Emission Factor in pounds VOC per ton of baked product

Y_i = initial baker's percent of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percent of yeast

t_s = spiking time in hours

- c. the rolling, 12-month summation of the baked products production rates as recorded in a., in tons, for the current month plus the preceding 11 calendar months;
- d. for each baked product, the VOC emissions calculated by multiplying the baked product production rate from a., in tons per month, by the emission rate calculated in b., in pounds of VOC per ton of baked product, and divided by 2000 pounds per ton, for an emission rate of tons of VOC per month;
- e. the total VOC emissions from this emissions unit, as the summation of the VOC emissions from the baked products as calculated in d., for an emission rate of tons of VOC per month; and
- f. the rolling, 12-month summation of the VOC emission rates as calculated in e., in tons, for the current month plus the preceding 11 calendar months.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 7.76 pounds of VOC per ton of baked product Applicable Emission Limitation;



- ii. all exceedances of the rolling, 12-month VOC Applicable Emission Limitation; and
- iii. all exceedances of the rolling, 12-month limitation of the production rate.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Emissions of nitrogen oxides (NO_x) shall not exceed 100 pounds per million cubic feet of natural gas.

Applicable Compliance Method:

If required, compliance with the NO_x emission limitation shall be demonstrated by an emissions test employing Method 7 of 40 CFR Part 60, Appendix A. If required, an alternative U.S. EPA approved test method may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established on the NO_x emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98, of 100 pounds of NO_x per million cubic feet of natural gas.

- b. Emission Limitation:

Emissions of carbon monoxide (CO) shall not exceed 84 pounds per million cubic feet of natural gas.

Applicable Compliance Method:

If required, compliance with the CO emission limitation shall be demonstrated by an emissions test employing Method 10 of 40 CFR Part 60, Appendix A. If required, an alternative U.S. EPA approved test method may be used with prior approval from the Ohio EPA.

The applicable emission limitation was established on the CO emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98, of 84 pounds of CO per million cubic feet of natural gas.

c. Emission Limitation and uncontrolled PTE:

Emissions of nitrogen oxides (NOx) shall not exceed 2.32 TPY.

Applicable Compliance Method:

If required, compliance with the annual NOx emission limitation shall be demonstrated by multiplying the actual annual usage of natural gas in the oven, in million cubic feet per year by the NOx emission factor of 100 pounds of NOx per million cubic feet of natural gas, and divided by 2000 pounds per ton, for an emission rate of TPY of NOx.

The applicable emission limitation and uncontrolled PTE NOx was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 and the NOx emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98:

5.4 Million Btu/hr, max heat input x million standard cubic feet (scf) of natural gas/1020 Million Btu = 0.005294 million scf of natural gas/hr, max heat input

0.005294 millionscf of natural gas/hr x 100 pounds NOx/million scf of natural gas = 0.53 pound NOx/hr

0.53 pound of NOx/hr x 8760 hrs/yr x 1 Ton/2000 pounds = 2.32 TPY of NOx.

d. Emission Limitation and uncontrolled PTE:

Emissions of carbon monoxide (CO) shall not exceed 1.93 TPY.

Applicable Compliance Method:

If required, compliance with the annual CO emission limitation shall be demonstrated by multiplying the actual annual usage of natural gas in the oven, in Millions of cubic feet per year by the CO emission factor of 84 pounds of CO per Million cubic feet of natural gas, and divided by 2000 pounds per ton, for an emission rate of TPY of CO.



Effective Date: To be entered upon final issuance

The applicable emission limitation and uncontrolled PTE CO was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 and the CO emission factor from AP-42, Fifth Ed., Chpt. 1.4, External Combustion Sources, Natural Gas, 7/98:

5.4 Million Btu/hr, max heat input x Million standard cubic feet (scf) of natural gas/1020 Million Btu = 0.005294 million scf of natural gas/hr, max heat input

0.005294 millionscf of natural gas/hr x 84 pounds CO/million scf of natural gas = 0.44 pound of CO/hr

0.44 pound of CO/hr x 8760 hrs/yr x 1 Ton/2000 pounds = 1.93 TPY CO.

e. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 7.76 pounds per ton of baked product.

Applicable Compliance Method:

Compliance with the pounds per ton of baked product VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).

The applicable emission limitation was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 and the calculation from AP-42, Fifth Ed., Chpt. 9.9.6, Food & Agricultural Products, Bread Baking, 2/97, for the sandwich thins baked product:

$$\text{VOC EF} = 0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$$

$$\text{VOC EF} = 0.95 (6.0) + 0.195 (0.8) - 0.51 (0) - 0.86 (0) + 1.90$$

$$\text{VOC EF} = 5.70 + 0.16 - 0 - 0 + 1.90$$

$$\text{VOC EF} = 7.76 \text{ pounds of VOC per ton of baked product}$$

f. Emission Limitation:

Emissions of VOC shall not exceed 60.00 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual rolling, 12-month VOC emission limitation shall be demonstrated by the recordkeeping requirements in d)(1).



The applicable emission limitation was established based on information provided by the permittee in application A0045500 for FEPTIO P0110403 using the VOC EF as calculated for the white buns baked product:

7.76 pounds of VOC/ton of baked product x 15,464 tons of baked product x 1 Ton/2000 pounds = 60.00 TPY of VOC.

g) Miscellaneous Requirements

- (1) None.